Exhibit 6

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	§ § § §	MDL NO. 2875 HONORABLE ROBERT B. KUGLER DISTRICT COURT JUDGE

ORAL AND VIDEOTAPED DEPOSITION OF
JOHN L. QUICK
JANUARY 27, 2022

ORAL AND VIDEOTAPED DEPOSITION OF JOHN L. QUICK, produced as a witness at the instance of the Defendants and duly sworn, was taken in the above styled and numbered cause on Thursday, January 27, 2022, from 9:33 a.m. to 7:00 p.m., before TAMARA CHAPMAN, CSR, RPR-CRR in and for the State of Texas, reported by computerized stenotype machine, at the offices of Slack Davis Sanger, LLP, 6001 Bold Ruler Way, Suite 100, Austin, Texas, pursuant to the Federal Rules of Civil Procedure and any provisions stated on the record herein.

(Simultaneous speaking.)
MR. DAVIS: You can answer.
THE WITNESS: I'm sorry.
MR. DAVIS: Wait for me to finish my instruction.
Mischaracterizes his testimony and his report.
You can answer.
A. So that's not what my report says. My report basically says that I'm referring to the CG -- you're putting your hand up.
My report says that I'm referring to the CGMP violations of the company relative to the class group. That's what I'm referring to. I don't get into the fact that those are adulterated. I don't say that. I'm just talking about the violations as they apply to the class group. I'm just referring to what the FDA refers to -- as to these as, as being adulterated.
Q. So you're not rendering an opinion as to any -- as to whether any product was adulterated?
MR. DAVIS: Objection to form; mischaracterizes his testimony and his report.
A. So I'll say again what I just said, is I'm referring to the GMP violations of the various

companies relative to the class group, okay, in regard to these various companies. And I'm pointing out the FDA's interpretation of that is you have the CGMP violations, the products are considered to be adulterated.

I didn't say that the FDA says that for CGMP -- CGMP violations. I'm not saying that these products are adulterated. I'm saying that they violated -- that they were not in compliance with CGMPs.

Q. So you're not saying that any valsartan-containing drug was adulterated?

A. No, I do not.

MR. DAVIS: Objection.

THE WITNESS: Sorry.

MR. DAVIS: And mischaracterizes his report.

A. I didn't say that.

(Discussion off the written record.)

(The requested material was read.)

Q. I just want to make sure -- withdrawn.

So just to clarify, are you stating that it is the FDA's position that a single minor observation about a single product line in a 483 represents FDA's determination that all products

clear. You only reviewed what's on Exhibit A. Right?

A. That's correct.

Q. Okay. So did you do -- did anything in Exhibit A -- if you look at that list, did you do anything to independently verify whether ZHP conducted a formal risk assessment?

MR. DAVIS: Object to form.

You can answer.

A. So my role was to come up -- was to identify example -- examples of CH -- of CGMP deficiencies that might apply to the entire class, and not -- it was not exhaustive.

That may be part of a later scope in this process, but that's -- I did not do an independent review of any other aspects of the ZHP EIR.

Q. Okay. So the answer to my question is, no, you didn't do any independent assessment of whether or not ZHP did a formal risk assessment. Right?

MR. DAVIS: Objection. He's already given his answer.

Q. Sir, are you going to answer my question?

A. The answer --

Q. The answer is no.